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June 1, 2018

**Via CM-ECF**

Honorable Valerie E. Caproni  
 United States District Judge  
 United States District Court  
 Southern District of New York  
 Thurgood Marshall United States Courthouse  
 40 Foley Square  
 New York, New York 10007

Re: *United States v. Joseph Percoco, et al.*, No. 16-CR-776 (VEC) (S.D.N.Y.)

Dear Judge Caproni:

We are counsel for Defendant Louis Ciminelli. We write to provide the Court with the single document that lists the for-cause challenges on which the parties agree and those on which they do not agree. The challenges follow.

Party	For-cause challenges to the following jurors
<b>Joint challenges – all parties agree</b>	1, 9, 15, 47, 73, 84, 102, 107, and 122.
<b>Challenge by the government only</b>	None.
<b>Challenge by all Defendants only</b>	8, 11, 16, 25, 26, 36, 37, 38, 39, 40, 43, 46, 54, 58, 60, 62, 63, 70, 72, 76, 79, 80, 82, 85, 89, 93, 95, 96, 100, 103, 110, 113, 120, 126, 129, and 132.

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The for-cause challenges above are made without regard to jurors with extreme hardship and/or pre-paid travel (questions 1 and 2). The parties discussed submitting an additional joint list of proposed extreme hardship exclusions (based only on the responses to questions 1 and 2), but the Court did not order the parties to do so. If the Court would like the parties to do so, the parties propose that such a joint list in a single document be submitted by Noon on Monday June 4, 2018.

Please contact me if you have any questions.

Respectfully yours,

/s/Timothy W. Hoover

Timothy W. Hoover

TWH/dcb

cc: All counsel of record (*via CM-ECF*)